

**JAMES A. SAVILLE, JR.**  
**KIPP C. LELAND**  
**HILL RIVKINS & HAYDEN LLP**  
Attorneys for Defendant  
Land Air Express, Inc.

45 Broadway  
New York, New York 10006  
(212) 669-0600

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF NEW YORK**

-----  
METEOR AG, and its Interested Subrogated  
Underwriters;

**Index No.: 08 Civ 3773 (JGK)**

Plaintiff,

**-Against-**

FEDERAL EXPRESS CORPORATION, FEDEX,  
FEDEX CORPORATION, TNT FREIGHT  
MANAGEMENT (USA) INC., GEODIS WILSON  
USA, INC. and LAND AIR EXPRESS;

Defendants.

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**DEFENDANT LAND AIR  
EXPRESS' REPLY TO  
CROSS CLAIMS**

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X

Defendant, Land Air Express, Inc., by and through its attorneys Hill Rivkins & Hayden LLP as and for its Reply to the Cross Claims of Defendants TNT Freight Management (USA) Inc. and Geodis Wilson USA, Inc., states upon information and belief as follows:

1. Defendant Land Air denies the allegations set forth in Paragraph 1 of the Cross Claim.
2. Defendant Land Air denies the allegations set forth in Paragraph 2 of the Cross Claim.

3. Defendant Land Air denies the allegations set forth in Paragraph 3 of the Cross Claim.

4. Defendant Land Air denies the allegations set forth in Paragraph 4 of the Cross Claim.

Dated: June 24, 2008

HILL RIVKINS & HAYDEN LLP

*Attorneys for Defendant*

*Land Air Express Inc.*

By:

  
James A. Saville, Jr.

Kipp O. Leland

45 Broadway, Suite 1500  
New York, New York 10006

TO:

Lawrence C. Glynn, Esq.  
Nicoletti Hornig & Sweeney  
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USA, INC. and LAND AIR EXPRESS;

Defendants.

**AFFIDAVIT OF SERVICE**  
**BY MAIL**

-----**X**

**STATE OF NEW YORK**

**ss.:**

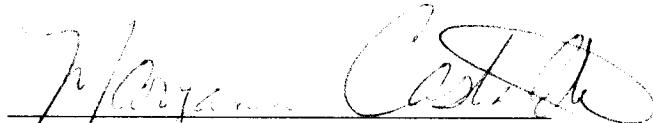
**COUNTY OF NEW YORK**

The undersigned, being duly sworn, says: I am not a party to the action, am over 18 years of age and resides at Staten Island, New York 10309. That on the 24<sup>TH</sup> day of June 2008, I served the annexed **Defendant Land Air Express' Reply to Cross Claims** by depositing a true copy thereof enclosed in a post-paid wrapper, in an official depository under the exclusive care and custody of the U.S. Postal Service within New York state, addressed to each of the following persons at the last known address set forth after each name:

Lawrence C. Glynn, Esq.  
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Maryann Castaldo

Sworn to before me this  
24<sup>th</sup> day of June 2008.



Notary Public

ROBERT BLUM  
Notary Public, State Of New York  
No.01BL4314091  
Qualified in Kings County  
Certificate Filed in New York County  
Commission Expires December 7, 2004